

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KAREN KAY BUCKLEY,

CIVIL ACTION NO. 1:19-cv-00794

Plaintiff,

JURY TRIAL DEMANDED

-vs.-

UNIVERSAL SEWING SUPPLY, INC.

Defendant,

DEFENDANT'S MOTION TO EXTEND DISCOVERY DEADLINES

AND NOW, comes Defendant, Universal Sewing Supply, Inc. by and through their attorneys, Hardin Thompson, P.C., Kenneth J. Hardin II, and with the concurrence of Plaintiff, by and through their attorneys, McNees Wallace & Nurick LLC. and Carol Steinour Young, and file the within Defendant's Motion to Extend Discovery Deadlines and in support thereof sets forth the following:

1. There was a Scheduling Order entered into this matter on January 4, 2021.
2. The Scheduling Order set fact discovery to close in this matter on June 30, 2021.
3. The undersigned Defense Counsel will require additional time to conduct additional discovery and depositions in this matter.
4. There are still depositions that need to be taken in this matter.
5. We will not be able to obtain and schedule the same within the current discovery time frame.
6. Additionally, due to Covid-19, it has been more difficult to secure records, schedule, and produce discovery.
7. This is a first request for extension of the discovery deadline.

8. All parties agree with and concur with the requested extension and no party to this litigation will be prejudiced by extending the discovery deadlines.
9. Given all the factors laid out above, all parties requests that this Court extend discovery deadlines by forty-five (45) days, or until August 13, 2021 as follows:
 - a. Fact discovery deadline by a period of 45 days until August 13, 2021.
10. All remaining deadlines will remain in place.

WHEREFORE, Defendant, with concurrence of Plaintiff, requests that this Honorable Court grant this Motion to Extend Discovery Deadlines by forty-five (45) days or until August 13, 2021.

Respectfully submitted,

HARDIN THOMPSON, P.C.

/s/ Kenneth J. Hardin

Kenneth J. Hardin II PA ID 58303
The Frick Building
437 Grant Street, Suite 620
Pittsburgh, PA 15219
(412) 315-7195 / (412) 315-7386 (fax)
kenhardin@hardinlawpc.net

Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KAREN KAY BUCKLEY,

CIVIL ACTION NO. 1:19-cv-00794

Plaintiff,

JURY TRIAL DEMANDED

-vs.-

UNIVERSAL SEWING SUPPLY, INC.

Defendant,

CERTIFICATE OF CONCURRENCE

I, Kenneth J. Hardin, II, Esquire, hereby certify that the undersigned counsel sought concurrence for Plaintiff via email on June 18, 2021 in regard to Defendant's Motion to Extend Discovery Deadlines. Plaintiff's Counsel, Carol Steinour Young responded to our request for concurrence at the time of filing and indicated her agreement to the same.

HARDIN THOMPSON, P.C.

/s/ Kenneth J. Hardin

Kenneth J. Hardin

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Defendant's Motion to Extend Discovery Deadlines was served upon all parties of record, via Email by ECF Notification and regular mail, this 22nd day of June 2021, addressed as follows:

**Carol Steinour Young
Lois B. Duquette
Emily H. Doan
MCNEES WALLACE & NURICK LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
csteinour@mcneeslaw.com
*Counsel for Plaintiff***

HARDIN THOMPSON, P.C.

/s/ Kenneth J. Hardin

Kenneth J. Hardin

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KAREN KAY BUCKLEY,

CIVIL ACTION NO. 1:19-cv-00794

Plaintiff,

JURY TRIAL DEMANDED

-vs.-

UNIVERSAL SEWING SUPPLY, INC.

Defendant,

ORDER

AND NOW, this _____ day of _____, 2021, upon due consideration of the Defendant's Motion to Extend Discovery Deadlines to include a discovery deadline 45 days to August 13, 2021, it is hereby ORDERED, ADJUDGED, and DECREED that the Motion is GRANTED and the parties have until August 13, 2021 to complete discovery, AND all other deadlines will remain in place.

J.